

Exhibit A

Subject: RE: holland v. cryptozoo
Date: Monday, January 15, 2024 at 9:38:19 AM Central Standard Time
From: Tal J Lifshitz <tjl@kttlaw.com>
To: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>, Leigh S. Montgomery <Leigh@ellzeylaw.com>, Benjamin Widlanski <bwidlanski@kttlaw.com>
CC: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>, Clayton J Schmitt <cschmitt@kttlaw.com>, Gerdes, Lindsay <Lindsay.Gerdes@dinsmore.com>, Seiling, Brad <BSeiling@manatt.com>, Shelby O'Brien <sobrien@enochkever.com>, Moses, Sarah <SMoses@manatt.com>
Attachments: image001.png, image002.jpg, image003.jpg, image004.png, image005.png, image006.png, image007.png, image008.png, image009.jpg, image010.png, image011.png, image012.jpg, image013.png, image014.jpg, image015.png

Jarrett, thank you. Based on your representation that Strobel's counsel has already opposed, and that the new proposed complaint is exactly the same just with additional plaintiffs, you can represent that Mr. Paul opposes. I speak only on behalf of Mr. Paul and not any other Defendants.

TAL J. LIFSHITZ, ESQ. | PARTNER



2525 Ponce de Leon Boulevard, Floor 9, Miami, Florida 33134

Phone 305.372.1800 | **Direct** 305.728.2959 | **Email** tjl@kttlaw.com

Firm Bio | [Personal LinkedIn](#) | [KTT LinkedIn](#)

From: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Sent: Friday, January 12, 2024 2:45 PM
To: Tal J Lifshitz <tjl@kttlaw.com>; Leigh S. Montgomery <Leigh@ellzeylaw.com>; Benjamin Widlanski <bwidlanski@kttlaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Rachel Sullivan <rs@kttlaw.com>; Jeffrey J Leavitt <jleavitt@kttlaw.com>; Clayton J Schmitt <cschmitt@kttlaw.com>; Gerdes, Lindsay <Lindsay.Gerdes@dinsmore.com>; Seiling, Brad <BSeiling@manatt.com>; Shelby O'Brien <sobrien@enochkever.com>; Moses, Sarah <SMoses@manatt.com>
Subject: Re: holland v. cryptozoo

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Tal,

Thank you for pointing that out – we will be sure to copy all counsel. We are preparing for trial Tuesday and are a bit scrambled. I responded to your last email believing all parties were copied. My mistake.

Strobel counsel is opposed to the MFL. As for the amended MFL/complaint, the amendment will knock out the first motion for leave, so there is no need to withdraw it, unless I am missing a quirky local rule. The proposed complaint we are filing soon is exactly like the version you have now, only we are adding additional plaintiffs. Thus, there is nothing for me to highlight for you. And, again, the claims are the same. You already have the complaint in hand, so there is no reason for me to send you the new one unless you insist.

Ellzey & Associates

Jarrett L. Ellzey
1105 Milford Street
Houston, Texas 77006
(713) 554-2376 – Direct
Licensed in Texas & New Mexico



CIVIL TRIAL LAW

American Board
of Trial Advocates



From: Tal J Lifshitz <tjl@kttlaw.com>

Date: Friday, January 12, 2024 at 1:34 PM

To: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>, Leigh S. Montgomery <Leigh@ellzeylaw.com>, Benjamin Widlanski <bwidlanski@kttlaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrllawfirm.com>, Jason Mays <jmays@mnrllawfirm.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>, Clayton J Schmitt <cschmitt@kttlaw.com>, Gerdes, Lindsay <Lindsay.Gerdes@dinsmore.com>, Seiling, Brad <BSeiling@manatt.com>, Shelby O'Brien <sobrien@enochkever.com>, Moses, Sarah <SMoses@manatt.com>

Subject: RE: holland v. cryptozoo

Jarrett,

I've looped in co-defense counsel. I'd request that moving forward you please reach out to us collectively on conferral issues. Relatedly, can you clarify: are you withdrawing your currently pending motion to amend, and filing a new motion for leave to amend a complaint with the same claims but additional plaintiffs? Or will there be additional claims as well? If you can send us a copy of the proposed pleading – highlighting the differences - that would be excellent. Then we can, if necessary, provide a time to discuss. Also, kindly let us know which defendant has already opposed, and whether they have opposed this most recent request, or if you're relying on this defendant's original opposition.

TAL J. LIFSHITZ, ESQ. | PARTNER



2525 Ponce de Leon Boulevard, Floor 9, Miami, Florida 33134

Phone [305.372.1800](tel:305.372.1800) | Direct [305.728.2959](tel:305.728.2959) | Email tjl@kttlaw.com

[Firm Bio](#) | [Personal LinkedIn](#) | [KTT LinkedIn](#)

From: Jarrett L. Ellzey
<Jarrett@ellzeylaw.com>

Sent: Friday, January 12, 2024

11:33 AM

To: Tal J Lifshitz <tjl@kttlaw.com>; Leigh S. Montgomery <Leigh@ellzeylaw.com>; Benjamin Widlanski <bwidlanski@kttlaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kyta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Rachel Sullivan <rs@kttlaw.com>; Jeffrey J Leavitt <jleavitt@kttlaw.com>; Clayton J Schmitt <cschmitt@kttlaw.com>

Subject: Re: holland v. cryptozoo

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Tal,

We will be filing an amended motion for leave to add additional plaintiffs to our proposed amended complaint. Please let us know as soon as possible if you are available to confer today or Monday. As we have explained, one defendant is already opposed to the amendment. However, you expressed interest in discussing the allegations (which you now have save a few plaintiffs), we can do so today or Monday.

Thank you very much for your attention to this matter.

 Ellzey & Associates

Jarrett L. Ellzey

1105 Milford Street

Houston, Texas 77006

(713) 554-2376 – Direct

Licensed in Texas & New Mexico



From: Tal J Lifshitz <tjl@kttlaw.com>
Date: Monday, January 8, 2024 at 12:15 PM
To: Leigh S. Montgomery <Leigh@ellzeylaw.com>, Benjamin Widlanski <bwidlanski@kttlaw.com>, Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>, Clayton J Schmitt <cschmitt@kttlaw.com>
Subject: RE: holland v. cryptozoo

Leigh, we disagree with your characterization of events. We'll be responding to your motion shortly.

TAL J. LIFSHITZ, ESQ. | PARTNER



2525 Ponce de Leon Boulevard, Floor 9, Miami, Florida 33134

Phone 305.372.1800 | **Direct** 305.728.2959 | **Email** tjl@kttlaw.com

Firm Bio | **Personal LinkedIn** | **KTT LinkedIn**

From: Leigh S. Montgomery <Leigh@ellzeylaw.com>
Sent: Monday, January 8, 2024 12:18 PM
To: Tal J Lifshitz <tjl@kttlaw.com>; Benjamin Widlanski <bwidlanski@kttlaw.com>; Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Rachel Sullivan <rs@kttlaw.com>; Jeffrey J Leavitt <jleavitt@kttlaw.com>; Clayton J Schmitt <cschmitt@kttlaw.com>
Subject: Re: holland v. cryptozoo

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Counsel,

We have conferred with you about our motion and its contents, but you never provided a response. Instead, you cancelled your conference set for 1/4 and are (I assume from your message below) refusing to confer today. Furthermore, instead of conferring with us on the date and time agreed upon, your client chose to file an answer before his extended deadline to do so and take actions to undermine our clients' legal claims.

Our certificate of conference in our motion accurately reflects the status of your failure to respond. We would be happy to file an amendment to that certificate, should you choose to provide a position on the motion. The proffered amendment was to address your failure to respond to our conference. We are still available today to discuss further.

Many Regards,

/s/ Leigh S. Montgomery

Leigh S. Montgomery
Senior Attorney

 Ellzey & Associates

1105 Milford Street
Houston, Texas 77006
Office: (713) 554-2377
Direct: (713) 554-0092
www.ellzeylaw.com

From: Tal J Lifshitz <tjl@kttlaw.com>

Date: Monday, January 8, 2024 at 10:46 AM

To: Leigh S. Montgomery <Leigh@ellzeylaw.com>, Benjamin Widlanski <bwidlanski@kttlaw.com>, Jarrett L. Ellzey <Jarrett@ellzeylaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>, Clayton J Schmitt <cschmitt@kttlaw.com>

Subject: RE: holland v. cryptozoo

Leigh, thanks for following up. As we previously explained, the purpose of this afternoon's call was to confer on your motion. In light of your filing, that is now moot. We appreciate your offer to file an amended certificate, however under the circumstances that will not address the failure to confer. We will respond to your motion shortly.

TAL J. LIFSHITZ, ESQ. | PARTNER



2525 Ponce de Leon Boulevard, Floor 9, Miami, Florida 33134

Phone [305.372.1800](tel:305.372.1800) | **Direct** [305.728.2959](tel:305.728.2959) | **Email** tjl@kttlaw.com
Firm Bio | **Personal LinkedIn** | **KTT LinkedIn**

From: Leigh S. Montgomery <Leigh@ellzeylaw.com>

Sent: Monday, January 8, 2024 10:17 AM

To: Tal J Lifshitz <tjl@kttlaw.com>; Benjamin Widlanski <bwidlanski@kttlaw.com>; Jarrett L. Ellzey <Jarrett@ellzeylaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Rachel Sullivan <rs@kttlaw.com>; Jeffrey J Leavitt <jleavitt@kttlaw.com>

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Good morning,

We are available if you would like to discuss this afternoon at 4 ET (3 CDT). Obviously, we proceeded with our filing on Friday given we had opposition already from another Defendant. We would file an amended certificate of conference in accordance with any further conference on this issue.

Many Regards,

/s/ Leigh S. Montgomery

Leigh S. Montgomery
Senior Attorney

 Ellzey & Associates

1105 Milford Street
Houston, Texas 77006
Office: (713) 554-2377
Direct: (713) 554-0092
www.ellzeylaw.com

From: Tal J Lifshitz <tjl@kttlaw.com>

Date: Friday, January 5, 2024 at 7:35 PM

To: Benjamin Widlanski <bwidlanski@kttlaw.com>, Leigh S. Montgomery <Leigh@ellzeylaw.com>, Jarrett L. Ellzey <Jarrett@ellzeylaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>

Subject: RE: holland v. cryptozoo

Leigh, following up on Ben's below note. Can we confirm Monday's 4 pm est call? If you still intend to move to amend, we need to confer on that, as well as see the proposed pleading so we can meaningfully consider your request.

TAL J. LIFSHITZ, ESQ. | PARTNER



2525 Ponce de Leon Boulevard, Floor 9, Miami, Florida 33134

Phone [305.372.1800](tel:305.372.1800) | **Direct** [305.728.2959](tel:305.728.2959) | **Email** tjl@kttlaw.com

Firm Bio | **Personal LinkedIn** | **KTT LinkedIn**

From: Benjamin Widlanski <bwidlanski@kttlaw.com>

Sent: Wednesday, January 3, 2024 12:43 PM

To: Leigh S. Montgomery <Leigh@ellzeylaw.com>; Jarrett L.

Ellzey <Jarrett@ellzeylaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Tal J Lifshitz <tjl@kttlaw.com>; Rachel Sullivan <rs@kttlaw.com>; Jeffrev J Leavitt <jleavitt@kttlaw.com>

Subject: RE: holland v. cryptozoo

Leigh,

I don't think that noting that we're opposed is correct, as I don't think we have enough information to make a determination as to whether or not we are opposed. That's why, as we discussed before the holiday, we think a telephonic meet and confer is appropriate and should be held. If Monday doesn't work for you, please let us know another time that does.

Best,
Ben

From: Leigh S. Montgomery <Leigh@ellzeylaw.com>

Sent: Wednesday, January 3, 2024 11:54 AM

To: Benjamin Widlanski <bwidlanski@kttlawn.com>; Jarrett L. Ellzey <Jarrett@ellzeylaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Tal J Lifshitz <tjl@kttlawn.com>; Rachel Sullivan <rs@kttlawn.com>; Jeffrey J Leavitt <jleavitt@kttlawn.com>

Subject: Re: holland v. cryptozoo

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We can have a call on Monday, however, we are going to proceed with filing our amended complaint. It has been several months since mediation without any further settlement discussion or offers being exchanged. Our clients are ready to proceed. We will note Defendants as opposed to our motion for leave. If your day opens back up tomorrow, let me know.

Many Regards,

/s/ Leigh S. Montgomery

Leigh S. Montgomery
Senior Attorney

 Ellzey & Associates

1105 Milford Street
Houston, Texas 77006
Office: (713) 554-2377
Direct: (713) 554-0092
www.ellzeylaw.com

From: Benjamin Widlanski <bwidlanski@kttlaw.com>
Date: Wednesday, January 3, 2024 at 9:34 AM
To: Leigh S. Montgomery <Leigh@ellzeylaw.com>, Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Tal J Lifshitz <tjl@kttlaw.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>
Subject: RE: holland v. cryptozoo

Leigh,

Unfortunately, my calendar has filled up since I sent that note – could we push this call to Monday afternoon? Does 4pm est/3pm cst work?

Best,
Ben

From: Leigh S. Montgomery <Leigh@ellzeylaw.com>
Sent: Wednesday, January 3, 2024 10:02 AM
To: Benjamin Widlanski <bwidlanski@kttlaw.com>; Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Tal J Lifshitz <tjl@kttlaw.com>; Rachel Sullivan <rs@kttlaw.com>; Jeffrey J Leavitt <jleavitt@kttlaw.com>
Subject: Re: holland v. cryptozoo

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3pm ET (2 pm CDT) is fine for tomorrow. Let me know if we should send a call-in number or if we can just call you directly.

Many Regards,

/s/ Leigh S. Montgomery

Leigh S. Montgomery
Senior Attorney

 Ellzey & Associates

1105 Milford Street
Houston, Texas 77006
Office: (713) 554-2377
Direct: (713) 554-0092
www.ellzeylaw.com

From: Benjamin Widlanski <bwidlanski@kttlaw.com>
Date: Friday, December 29, 2023 at 8:26 AM
To: Leigh S. Montgomery <Leigh@ellzeylaw.com>, Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Tal J Lifshitz <tjl@kttlaw.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>
Subject: RE: holland v. cryptozoo

Leigh, that's fine on our end. I have a 4pm est call on the 4th, so if we can do it at 3pm, that would be preferable.

Thanks, and happy holidays.
Ben

From: Leigh S. Montgomery <Leigh@ellzeylaw.com>
Sent: Friday, December 22, 2023 3:01 PM
To: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>; Benjamin Widlanski <bwidlanski@kttlaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Tal J Lifshitz <tjl@kttlaw.com>; Rachel Sullivan <rs@kttlaw.com>; Jeffrey J Leavitt <jleavitt@kttlaw.com>
Subject: Re: holland v. cryptozoo

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Does January 4th in the afternoon work? That gives us a couple of days back from the holidays to reorient ourselves.

Many Regards,

/s/ Leigh S. Montgomery

Leigh S. Montgomery
Senior Attorney

 Ellzey & Associates

1105 Milford Street
Houston, Texas 77006
Office: (713) 554-2377
Direct: (713) 554-0092
www.ellzeylaw.com

From: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Date: Friday, December 22, 2023 at 1:47 PM
To: Benjamin Widlanski <bwidlanski@kttlawn.com>, Leigh S. Montgomery <Leigh@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jays@mnrlawfirm.com>, Tal J Lifshitz <tjl@kttlawn.com>, Rachel Sullivan <rs@kttlawn.com>, Jeffrey J Leavitt <jleavitt@kttlawn.com>
Subject: Re: holland v. cryptozoo

Great, thank you Ben. Let us know what day might be good for a call.

Happy Holidays!



Jarrett L. Ellzey
1105 Milford Street
Houston, Texas 77006
(713) 554-2376 – Direct
Licensed in Texas & New Mexico



From: Benjamin Widlanski <bwidlanski@kttlawn.com>
Date: Friday, December 22, 2023 at 1:39 PM
To: Leigh S. Montgomery <Leigh@ellzeylaw.com>, Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jays@mnrlawfirm.com>, Tal J Lifshitz <tjl@kttlawn.com>, Rachel Sullivan <rs@kttlawn.com>, Jeffrey J Leavitt <jleavitt@kttlawn.com>
Subject: RE: holland v. cryptozoo

Let's put a call on the calendar for right after the holidays to discuss. Don't stress about time. If we need to extend the tolling agreement to allow us time to meaningfully confer on the issues, that won't be a problem.

From: Leigh S. Montgomery <Leigh@ellzeylaw.com>
Sent: Friday, December 22, 2023 9:43 AM
To: Benjamin Widlanski <bwidlanski@kttlawn.com>; Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jays@mnrlawfirm.com>; Tal J Lifshitz <tjl@kttlawn.com>; Rachel Sullivan <rs@kttlawn.com>; Jeffrey J Leavitt <jleavitt@kttlawn.com>
Subject: Re: holland v. cryptozoo

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Counsel,

As explained in my previous email, Plaintiff intends to file a motion for leave to amend the complaint to add the additional claimants and claims under the federal securities law. Although I do not see that anyone really followed the terms of the executed tolling agreement – I take it from your 11/15/23 conference that was your intent as to Mr. Paul. If that is correct, then we will be filing our motion for leave and prior to 1/15/24 pursuant to the terms of the tolling agreement.

Let me know if I am mistaken as relates to the tolling agreement. Given the upcoming holidays, I wanted to ensure we had time to discuss/confer further if necessary. Otherwise, let me know Defendant's position on our motion for leave.

Many Regards,

/s/ Leigh S. Montgomery

Leigh S. Montgomery
Senior Attorney

 Ellzey & Associates

1105 Milford Street
Houston, Texas 77006
Office: (713) 554-2377
Direct: (713) 554-0092
www.ellzeylaw.com

From: Leigh S. Montgomery <Leigh@ellzeylaw.com>

Date: Monday, December 18, 2023 at 4:55 PM

To: Benjamin Widlanski <bwidlanski@kttlaw.com>, Jarrett L. Ellzey <Jarrett@ellzeylaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Tal J Lifshitz <tjl@kttlaw.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>

Subject: Re: holland v. cryptozoo

Good afternoon,

Jarrett, Alex and I are currently in a mediation. We can agree to an extension on your answer. Due to the pending expiration of the statutory tolling per the agreement, we are also going to seek leave and amend the complaint. We will confer further on this as we are ready to file, but wanted to let you know.

Many Regards,

/s/ Leigh S. Montgomery

Leigh S. Montgomery
Senior Attorney

 Ellzey & Associates

1105 Milford Street
Houston, Texas 77006
Office: (713) 554-2377
Direct: (713) 554-0092
www.ellzeylaw.com

From: Benjamin Widlanski <bwidlanski@kttlaw.com>
Date: Monday, December 18, 2023 at 3:34 PM
To: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>, Leigh S. Montgomery <Leigh@ellzeylaw.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Tal J Lifshitz <tjl@kttlaw.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>
Subject: RE: holland v. cryptozoo

Jarrett,

I hope your holidays are shaping up nicely. I write with a request: we would like a brief, seven-day extension on the deadline for our answer. It is currently due on January 2; this would make it due on January 9. As that acceptable? If so we will file a request with the court.

Thank you much,
Ben

From: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>
Sent: Wednesday, November 15, 2023 6:35 AM
To: Benjamin Widlanski <bwidlanski@kttlaw.com>
Cc: Tommy Kherkher <tom@attorneytom.com>; Leigh S. Montgomery <Leigh@ellzeylaw.com>; Alex Kykta <alex@ellzeylaw.com>; Jeffrey Neiman <jneiman@mnrlawfirm.com>; Jason Mays <jmays@mnrlawfirm.com>; Tal J Lifshitz <tjl@kttlaw.com>; Rachel Sullivan <rs@kttlaw.com>; Jeffrey J Leavitt <jleavitt@kttlaw.com>
Subject: Re: holland v. cryptozoo

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Ben,

We do not object to you withdrawing the MTD and request for 45 days to file an answer. As for the open mediation and settlement discussions, we did not get into the details of the negotiations, as I'm

sure you have been made aware of them. There is, however, a current offer from us made through Mr. Wulff, which I understand he has communicated to Manatt counsel. This offer was made to resolve the docket of 133 individual clients of ours and not the class action. If we are disengaging from mediation and negotiations, I intend to withdraw the offer and notify the mediator. Please advise.

We likewise look forward to working with you. Thanks.



Jarrett L. Ellzey
1105 Milford Street
Houston, Texas 77006
(713) 554-2376 – Direct
Licensed in Texas & New Mexico



From: Benjamin Widlanski <bwidlanski@kttlaw.com>

Date: Tuesday, November 14, 2023 at 4:17 PM

To: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>, Leigh S. Montgomery <Leigh@ellzeylaw.com>, Alex Kykta <alex@ellzeylaw.com>, Jeffrey Neiman <jneiman@mnrlawfirm.com>, Jason Mays <jmays@mnrlawfirm.com>, Tal J Lifshitz <tjl@kttlaw.com>, Rachel Sullivan <rs@kttlaw.com>, Jeffrey J Leavitt <jleavitt@kttlaw.com>

Subject: RE: holland v. cryptozoo

Thank you Jarrett, and nice to meet you Tommy, Leigh, and Alex. I've added the rest of my team, which is three other attorneys from my firm as well as Jeff Neiman and Jason Mays, from the firm Marcus Neiman Rashbaum.

And just to recap our call, you have no objection to us moving to withdraw Mr. Paul's MTD on personal jurisdiction grounds and requesting 45 days to answer the complaint. Further, any settlement offers you may provide (now or in the future) for Mr. Paul will be relayed solely to this group, but Manatt is staying in the case as to the other two defendants they currently represent and, of course, you are free to relay any offers you wish to them as they relate to their two clients.

We look forward to working with you on this matter.

Best,
Ben

From: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>

Sent: Tuesday, November 14, 2023 5:13 PM

To: Benjamin Widlanski <bwidlanski@kttlaw.com>

Cc: Tommy Kherkher <tom@attorneytom.com>; Leigh S. Montgomery <Leigh@ellzeylaw.com>; Alex Kykta <alex@ellzeylaw.com>

Subject: Re: holland v. cryptozoo

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Ben,

Thanks for the call today. I've copied the other lawyers at my firm who work on this case, as well as Tommy Kherkher, who is co-counsel. Please cc them on all future communications. Thank you.



Jarrett L. Ellzey
1105 Milford Street
Houston, Texas 77006
(713) 554-2376 – Direct
Licensed in Texas & New Mexico



From: Benjamin Widlanski <bwidlanski@kttlaw.com>

Date: Tuesday, November 14, 2023 at 4:00 PM

To: Jarrett L. Ellzey <Jarrett@ellzeylaw.com>

Subject: holland v. cryptozoo

Jarrett,

Nice talking to you. Please confirm the members of your team.

Thank you,
Ben

BENJAMIN J. WIDLANSKI, ESQ. | PARTNER



2525 Ponce de Leon Boulevard, Floor 9, Miami, Florida 33134

Phone 305.372.1800 | **Direct** 305.377.0660 | **Email** bwidlanski@kttlaw.com

Firm Bio | [Personal LinkedIn](#) | [KTT LinkedIn](#)